

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

IN RE BARD IVC FILTERS  
PRODUCTS LIABILITY LITIGATION

No. 2:15-MD-02641 -DGC

This Document Relates to:  
Civil Action No.: 2:16-cv-04115-DGC  
Sharica Williamson v. C.R. Bard, et al.

**AMENDED SECOND AMENDED  
MASTER SHORT FORM COMPLAINT  
FOR DAMAGES FOR INDIVIDUAL  
CLAIMS AND DEMAND FOR JURY  
TRIAL**

Plaintiff(s) named below, for their Complaint against Defendants named below,  
incorporate the Master Complaint for Damages in MDL 2641 by reference (Doc.364).

Plaintiff(s) further show the Court as follows:

1. Plaintiff/Deceased Party:

MICHAEL WILLIAMSON

2. Spousal Plaintiff/Deceased Party's spouse or other party making loss of  
consortium claim:

SHARICA WRIGHT

3. Other Plaintiff and capacity (i.e., administrator, executor, guardian,  
conservator):

1                    SHARICA WRIGHT, as Personal Representative of the Estate of MICHAEL

2                    WILLIAMSON

- 3                    4.      Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence at  
4                    the time of implant:

5                    Maryland

- 6                    5.      Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence at  
7                    the time of injury:

8                    North Carolina

- 9                    6.      Plaintiff's current state(s) [if more than one Plaintiff] of residence:

10                   North Carolina

- 11                   7.      District Court and Division in which venue would be proper absent direct filing:

12                   District of Columbia District Court

- 13                   8.      Defendants (check Defendants against whom Complaint is made):

14                   ☒      C.R. Bard Inc.

15                   ☒      Bard Peripheral Vascular, Inc.

- 16                   9.      Basis of Jurisdiction:

17                   ☒      Diversity of Citizenship

18                   ☐      Other: \_\_\_\_\_

- 19                   a.      Other allegations of jurisdiction and venue not expressed in Master  
20                   Complaint:

10. Defendants' Inferior Vena Cava Filter(s) about which Plaintiff(s) is making a claim (Check applicable Inferior Vena Cava Filter(s)):

☒ Recovery<sup>®</sup> Vena Cava Filter

☐ G2<sup>®</sup> Vena Cava Filter

☐ G2<sup>®</sup> Express Vena Cava Filter

☐ G2<sup>®</sup> X Vena Cava Filter

☐ Eclipse<sup>®</sup> Vena Cava Filter

☐ Meridian<sup>®</sup> Vena Cava Filter

☐ Denali<sup>®</sup> Vena Cava Filter

☐ Other: \_\_\_\_\_

11. Date of Implantation as to each product:

On or about April 20, 2004

12. Counts in the Master Complaint brought by Plaintiff(s):

☒ Count I: Strict Products Liability – Manufacturing Defect

☒ Count II: Strict Products Liability – Information Defect (Failure to Warn)

☒ Count III: Strict Products Liability – Design Defect

- ☒ Count IV: Negligence – Design
- ☒ Count V: Negligence – Manufacture
- ☒ Count VI: Negligence – Failure to Recall/Retrofit
- ☒ Count VII: Negligence – Failure to Warn
- ☒ Count VIII: Negligent Misrepresentation
- ☒ Count IX: Negligence *Per Se*
- ☒ Count X: Breach of Express Warranty
- ☒ Count XI: Breach of Implied Warranty
- ☒ Count XII: Fraudulent Misrepresentation
- ☒ Count XIII: Fraudulent Concealment
- ☒ Count XIV: Violations of District of Columbia Law Prohibiting  
Consumer Fraud and Unfair and Deceptive Trade Practices
- ☐ Count XV: Loss of Consortium
- ☒ Count XVI: Wrongful Death
- ☒ Count XVII: Survival
- ☒ Punitive Damages
- ☐ Other(s): \_\_\_\_\_ (please state the facts supporting  
this Count in the space immediately below)

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13. Jury Trial demanded for all issues so triable?

☒ Yes

☐ No

RESPECTFULLY SUBMITTED this 19<sup>th</sup> day of January, 2017.

**LOPEZ McHUGH LLP**

By: /s/Matthew R. Lopez

Ramon Rossi Lopez (CA Bar No. 86361)  
(admitted *pro hac vice*)

Matthew Ramon Lopez (CA Bar No. 263134)  
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*Attorneys for Plaintiffs*

I hereby certify that on this 19<sup>th</sup> day of January, 2017, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/Matthew R. Lopez